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February 26, 2009

Marlene H. Dortch, Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Suite TW-A325
Washington, D.C. 20554

Re: EB Docket No. 06-36
Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2008

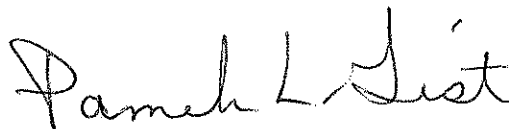
WestLink Communications, LLC
Form 499 Filer ID 821344

Dear Ms. Dortch:

On behalf of WestLink Communications, LLC, and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carrier's CPNI certification for 2008 with accompanying statement.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,



Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)
Best Copy and Printing, Inc. (1)

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: February 26, 2009

Name of company covered by this certification:

WestLink Communications, LLC
Form 499 Filer ID 821344

Address: P.O. Box 707
Ulysses, Kansas 67880-0707

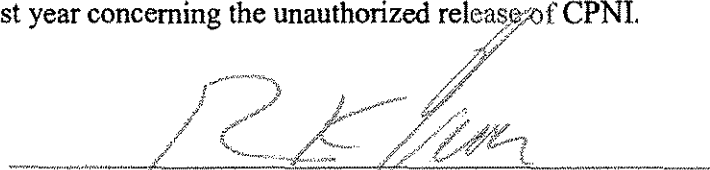
Name of signing officer: Richard K. Veach

Title of signatory: Chief Executive Officer

CERTIFICATION

I, Richard K. Veach, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement which (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the Commission's rules, (ii) explains any action taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.



Name: Richard K. Veach
Title: Chief Executive Officer
Date: February 25, 2009

Company Name ("Carrier"): WestLink Communications, LLC

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier provides annual training for all employees and individual training for new employees. Employees are provided with a continually updated Code of Ethics that includes the Commission's regulations regarding the protection of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of carrier compliance for a minimum period of one year. Specifically, Carrier's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations, electronically or otherwise, in connection with these procedures. Carrier has established a system of personal identification numbers (PINs), passwords and back-up authentication methods for all customer and accounts, in compliance with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified of account changes including changes to passwords, back-up means of authentication for lost or forgotten passwords, or address of record.

- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2008, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission: No actions taken
- The following is information Carrier has with respect to the processes pretexters are using to attempt to access CPNI, and [if any] what steps carriers are taking to protect CPNI: No information received
- The following is a summary of all customer complaints received in 2008 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2008 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: 2
 - Category of complaint:
 - 0 Number of instances of improper access by employees
 - 2 Number of instances of improper disclosure to individuals not authorized to receive the information
 - 0 Number of instances of improper access to online information by individuals not authorized to view the information
 - 0 Number of other instances of improper access or disclosure
 - Summary of customer complaints received in 2008 concerning the unauthorized release of CPNI:
 1. In March 2008, WestLink Communications, LLC, received a customer complaint regarding improper disclosure by an employee. The customer complained a WestLink customer service representative disclosed call detail information from her account to her sister-in-law. Following an extensive investigation that included seven employee interviews, interviews with the customer and the customer's sister-in-law, and an audit of the account, it was determined the customer service representative did not improperly disclose the customer's call detail information. The interviews and the lack of an "access footprint" on the customer's account led to this conclusion. No disciplinary action was taken.
 2. In November 2008, WestLink Communications, LLC, received a customer complaint regarding improper disclosure by an employee. The customer complained a WestLink male sales associate disclosed call detail information from her account to her estranged husband. The

estranged husband was not listed on the account as an owner, nor as an authorized signer. Following an extensive investigation that included three employee interviews, an interview the customer, and an audit of the account, it was recommended the sales associate receive a written warning that would be added to his personnel file. While the call detail report provided with the complaint is consistent with the store printer at the retail store in question, and the male sales associate was the only sales associate working during the date and time the call detail was printed, this did not warrant employee termination. The customer had previously requested to break her contract. Following the complaint, the customer again requested to break her contract because the improper disclosure proved WestLink could not be trusted with her information. Additionally, the customer had received printed call detail many times from the retail, normally in the presence of her estranged husband. The sales associate received a written warning, which was added to his personnel file.